

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875 HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)
THIS DOCUMENT RELATES TO ALL CASES	

**CERTIFICATION OF DANIEL NIGH IN SUPPORT OF
PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT –
TORRENT'S STATEMENT OF MATERIAL FACTS**

DANIEL NIGH, hereby certify as follows:

1. I am an attorney at law within the State of Florida, and a partner with the law firm of NIGH GOLDENBERG RASO, & VAUGHN, PLLC, and serve as Plaintiffs' Co-Lead Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' motion for partial summary judgment.
2. Attached hereto as **Exhibit 1** is a true and accurate copy of the transcript of Jaiswal Singh's June 4, 2021 deposition.
3. Attached hereto as **Exhibit 2** is a true and accurate copy of the transcript of Sushil Jaiswal's June 6, 2021 deposition.

4. Attached hereto as **Exhibit 3** is a true and accurate copy of Dawn Chitty's May 13, 2021 deposition.

5. Attached hereto as **Exhibit 4** is a true and accurate copy of Kelly Gegenheimer's April 14, 2021 deposition.

6. Attached hereto as **Exhibit 5** is a true and accurate copy of Kelly Gegenheimer's April 15, 2021 deposition.

7. Attached hereto as **Exhibit 6** is a true and accurate copy of Sue Perry's deposition.

8. Attached hereto as **Exhibit 7** is a true and accurate copy of Jocelyn Rivera's deposition.

9. Attached hereto as **Exhibit 8** is a true and accurate copy of ZHP00496536.

10. Attached hereto as **Exhibit 9** is a true and accurate copy of TORRENT-MDL-2875-00133890.

11. Attached hereto as **Exhibit 10** is a true and accurate copy of TORRENT-MDL2875-00072713.

12. Attached hereto as **Exhibit 11** is a true and accurate copy of TORRENT-MDL2875-00131255.

13. Attached hereto as **Exhibit 12** is a true and accurate copy of TORRENT-MDL2875-00366172.

14. Attached hereto as **Exhibit 13** is a true and accurate copy of TORRENT-MDL2875-00557249.

15. Attached hereto as **Exhibit 14** is a true and accurate copy of TORRENT-MDL2875-00557247.

16. Attached hereto as **Exhibit 15** is a true and accurate copy of TORRENT-MDL2875-00232735.

17. Attached hereto as **Exhibit 16** is a true and accurate copy of TORRENT-MDL2875-00511197.

18. Attached hereto as **Exhibit 17** is a true and accurate copy of TORRENT-MDL2875-00555405.

19. Attached hereto as **Exhibit 18** is a true and accurate copy of TORRENT-MDL2875-00515246.

20. Attached hereto as **Exhibit 19** is a true and accurate copy of TORRENT-MDL2875-00190373.

21. Attached hereto as **Exhibit 20** is a true and accurate copy of TORRENT-MDL2875-00090456.

22. Attached hereto as **Exhibit 21** is a true and accurate copy of TORRENT-MDL2875-00072542.

23. Attached hereto as **Exhibit 22** is a true and accurate copy of TORRENT-MDL2875-00269671.

24. Attached hereto as **Exhibit 23** is a true and correct copy of the FDA Updates and Press Announcements on Angiotensin II Receptor Blocker (ARB) Recalls (Valsartan, Losartan, and Irbesartan), *Interim Limits for NDMA, NDEA, and NDBA in Angiotensin Receptor Blockers (ARBs)*, available at <https://www.fda.gov/drugs/drug-safety-and-availability/fda-updates-and-press-announcements-angiotensin-ii-receptor-blocker-arb-recalls-valsartan-losartan> (previously marked as Torrent Deposition Exhibit 77).

25. Attached hereto as **Exhibit 24** is a true and correct copy of TORRENT-MDL2875-00007721.

26. Attached hereto as **Exhibit 25** is a true and correct copy of TORRENT-MDL2875-00003680.

27. Attached hereto as **Exhibit 26** is a true and correct copy of TORRENT-MDL2875-00003433.

NIGH, GOLDBERG, RASO, & VAUGHN
Attorneys for Plaintiffs

By: /s/ Daniel Nigh

Dated: December 22, 2023